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# U S NAVY RESPONSES TO FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION COMMENTS ON THE DRAFT FINAL CORRECTIVE MEASURES STUDY FOR SOLID WASTE MANAGEMENT UNITS 8, 9, 11 AND 51 REVISION 1 NS MAYPORT FL

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Naval Facilities Engineering Command, Southeast
ATTN: Mr. Dana Hayworth (OPC 6)
Remedial Project Manager
135 Ajax Street North, Building 135
Naval Air Station Jacksonville
Jacksonville, FL 32212-0030

Reference: CLEAN IV Contract Number N62467-04-D-0055
Contract Task Order Number 0033

Subject: Response to Comments, Draft-Final Corrective Measures Study for Solid Waste Management Units 8, 9, 11, and 51, Revision 1, Naval Station Mayport, Jacksonville, Florida

Dear Mr. Hayworth:

Tetra Tech, Inc. is pleased to submit this Response to Comments Letter for the Draft-Final Corrective Measures Study for Solid Waste Management Units (SWMUs) 8, 9, 11, and 51, Revision 1, at Naval Station (NAVSTA) Mayport, Jacksonville, Florida. The questions and/or comments received by Tetra Tech are addressed below.

## FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION, Mr. John Winters

**SWMU 8:** The Department concurs with the chosen groundwater corrective measure alternative (LUCs and Monitoring). The Department does not concur with the chosen soil corrective measure alternative (No Action). As documented on Page 2-6 in the Surface Soil section, sample MPT-08-SB38-01-102606 exhibited a benzo(a)pyrene concentration in excess of the residential soil cleanup target level (SCTL). Therefore, the alternatives for soil corrective measures should be discussed at our next Partnering Team meeting (December 3 and 4, 2013).

**Response:** The section was changed to read as follows, "The COC screening evaluation for surface soil involves an evaluation of COIs for direct exposure and leaching to groundwater. Two SVOCs (PAHs), 2 pesticides, and 11 metals were detected in the surface soil samples. The direct exposure COC screening results for surface soil are shown in Appendix A, and identified one sample at location MPT-08-SB38 with benzo(a)pyrene (BAP) and BAP equivalents exceeding the SCTLs for residential direct exposure. The sample was collected adjacent to what was presumed to be the discharge pipe for SWMU 8; however, further research showed that the SWMU 8 overflow pipe discharged to the St. Johns River. The sample location is located in a stormwater swale designed to treat drainage from adjacent asphalt roads and parking areas. The sample location is further than 200 feet away from SWMU 8 and the sample results are considered to be anthropogenic from the asphalt and vehicles;

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therefore, this sample is not considered to be a COC for SWMU 8. Figure 2-3 shows soil sample locations."

Figure 2-3 will be annotated that the sample result identified is not considered to be connected to SWMU 8.

**SWMU 11:** The only soil samples that exceed SCTLs are for total petroleum hydrocarbon (TPH) at 13 feet below land surface (bls), and the groundwater does not exceed GCTLs for TPH. The groundwater elevation at monitoring well MPT-11-5S is 10 feet bls. This appears to be a groundwater issue since the soil samples were taken below the water table.

**Response:** Section 4.3.2 was changed to read as follows, "The field notes were evaluated to determine the sample integrity for the subsurface soil samples collected at SWMU 11. Twenty-four soil samples were collected at SWMU 11 in 2006 and 2007. Four of the 24 samples exceeded the Soil Cleanup Target Levels (CTLs) for Total Recoverable Petroleum Hydrocarbon (TRPH) at 13 feet bls. A review of the field notes for the subsurface soil samples (MPT-11-SB01-13-102506, MPT-11-SB06-13-102506, MPT-11SB09-013-102506, and MPT-11-SB11-013-040907) indicate that the samples were collected in the 12- to 13-foot range. The field notes for MPT-11-SB11 indicate that the sample was wet when collected.

The groundwater levels were then reviewed in the field notes for the groundwater samples collected on November 7 and 8, 2006. The monitoring wells are located in SWMU 11, near the identified soil sample locations. The depth to groundwater for monitoring well MPT-08-MW05S at SWMU 11 was 9.7 feet bls, and the depth to groundwater for monitoring well MPT-08-MW12S was 10.7 feet bls. The distance from SWMU 11 to the tidally-influenced St Johns River is less than 300 feet. Groundwater sample results taken from the two monitoring wells located in the SWMU did not exceed the groundwater CTLs for any analytes, including TRPH. The subsurface soil samples were located within the saturated interval, and should be evaluated with groundwater. No groundwater contamination is present, which indicates that any TRPH in soil is not leaching to groundwater; therefore, no COCs are identified for subsurface soil."

Section 4.3.4 was changed to read as follows, "No ecological COCs were identified at SWMU 11."

Section 4.3.5 was changed to read as follows, "No COCs for surface soil, subsurface soil, or groundwater were identified for SWMU 11."

Section 4.4 was changed to read as follows, "No COCs were identified for surface soil, subsurface soil, or groundwater at SWMU 11; therefore, contamination maps were not prepared."

Section 4.5 was changed to read as follows, "Corrective measure technologies are identified and screened to address the CAOs identified for SWMU 11 (see Section 1.5.1). Neither soil nor groundwater technologies are required because there are no COCs at SWMU 11."

Section 4.6 was changed to read as follows, "No Action is recommended for addressing the soil and groundwater at SWMU 11."

Sections 4.7 through 4.11.3 were removed.

Figure 4-3 was annotated that the sample results identified were collected in the saturated interval and were evaluated with groundwater.

If you have any questions with regard to this submittal, please contact me at (904) 730-4669, extension 215, or via e-mail at gregory.roof@tetratech.com.

Sincerely,

Gregory S. Roof, P.E.
Project Manager

GSR/df

c: John Winters, FDEP (electronic only)
Paul Malewicki, NAVSTA Mayport (1 hardcopy, 1 CD)
Debra Humbert, Tetra Tech (1 unbound, 1 CD)
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